

**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

LONNIE RANDOLPH,

Plaintiff,

v.

CROWN ASSET MANAGEMENT, LLC,

Defendants.

Case No.: 08 CV 3212

Judge Castillo

Magistrate Judge Brown

**UNOPPOSED MOTION FOR EXTENSION OF TIME TO ANSWER OR OTHERWISE  
PLEAD**

Defendant, CROWN ASSET MANAGEMENT, LLC, by its attorney, Todd P. Stelter, pursuant to Federal Rule of Civil Procedure 6(b), respectfully request that this court grant a 21 day extension of time, or up until July 30, 2008, to file a responsive pleading to plaintiff's complaint, and in support thereof, states as follows:

1. Plaintiff's complaint purports to state a claim under the Fair Debt Collection Practices Act against the defendants.
2. Plaintiff's Complaint was filed on June 3, 2008, and service was recently effectuated on defendants.
3. Defendants have not requested any previous extensions.
4. Defense counsel was recently retained and requires additional time to perform factual investigation prior to answering or otherwise pleading. This time is not meant for purposes of unnecessary delay and will not prejudice any party in the litigation. This time is necessary to analyze the pleading and prepare the appropriate response.
5. Defense counsel has communicated with plaintiff's counsel and it has been indicated that there is no opposition to this motion.

WHEREFORE, defendants respectfully request this court grant an extension of time up to and including July 30, 2008, to file a responsive pleading to plaintiff's complaint.

Respectfully submitted,

By: \_\_\_\_\_ s/ Todd P. Stelter \_\_\_\_\_  
One of Defendants Attorneys

David M. Schultz  
Todd Stelter  
HINSHAW & CULBERTSON LLP  
222 N. LaSalle Street  
Suite 300  
Chicago, IL 60601-1081  
312-704-3000

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION

LONNIE RANDOLPH,

Plaintiff,

v.

CROWN ASSET MANAGEMENT, LLC,

Defendants.

Case No.: 08 CV 3212

Judge Castillo

Magistrate Judge Brown

**CERTIFICATE OF SERVICE**

I hereby certify that on June 30, 2008, I electronically filed **UNOPPOSED MOTION FOR EXTENSION OF TIME TO ANSWER OR OTHERWISE PLEAD** with the Clerk of the Court using the CM/ECF system which will send notification of such filing(s) to the following:

**Dan Edelman**

dedelman@edcombs.com

Respectfully submitted,

By: s/Todd P. Stelter

David M. Schultz

Todd P. Stelter

HINSHAW & CULBERTSON LLP

222 N. LaSalle Street, Ste 300

Chicago, IL 60601

(312) 704-3000